

**IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREGORY STINNETT,)	
)	No. 08 C 709
Plaintiff,)	
v.)	Judge St. Eve
)	
THE CITY OF CHICAGO,)	Magistrate Judge Cox
)	
Defendant.)	

AGREED MOTION FOR ENTRY OF A PROTECTIVE ORDER

Defendant City of Chicago (“City”), by its attorney Mara S. Georges, Corporation Counsel of the City, and in agreement with plaintiff Gregory Stinnett (“plaintiff”), move this Court, pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 26.2, to enter a protective order in the form electronically mailed to this Court on September 9, 2008. In support of this agreed motion, the City states as follows:

1. Plaintiff is currently employed as an ambulance commander for the Chicago Fire Department (“CFD”). On February 1, 2008, plaintiff brought a one-count complaint against the City pursuant to Title VII of the Civil Rights Act of 1964. In his complaint, Stinnett alleges that the City discriminated against him by not promoting him to the position of field officer because of his race (African-American).

2. The City intends to produce in discovery documents and information that is not shared with the general public and that the City wishes to maintain as confidential. Specifically, the City seeks to keep confidential the personal information of any current or former City employees identified in discovery who are not parties to this action, including their race, any

social security numbers, driver's license numbers, employee numbers, birth dates, and home and/or cellular telephone numbers.

3. Additionally, the City anticipates producing information contained in current and former employees' personnel records and plaintiff's performance on promotional examinations. Personnel records of current and former employees are confidential records that are not disclosed to the public.

4. Finally, the City is producing plaintiff's medical records from the CFD and may subpoena plaintiff's medical records from physicians who treated him during the time period relevant to this lawsuit. The parties seek a protective order to preserve the confidentiality of plaintiff's medical records that they receive or produce in discovery.

5. The proposed protective order is narrowly tailored to restrict the dissemination of information that the parties seek to protect ("Confidential Material") by limiting who has access to the Confidential Material, and ensuring that if Confidential Material is used in discovery, it is designated confidential. The proposed protective also order sets forth procedures for the parties to follow if, during the course of the lawsuit, they seek to file any documents, transcripts, or exhibits referencing Confidential Material as part of a motion, brief, or other pleading.

6. Pursuant to this Court's standing order, the City will submit a draft of a proposed protective order to the Court via electronic mail at Proposed_Order_St_Eve@ilnd.uscourts.gov, and will serve a copy of the proposed protective order on plaintiff's counsel contemporaneously with the filing of this motion.

Accordingly, defendant City of Chicago, in agreement with plaintiff Gregory Stinnett, respectfully requests that the Court enter the proposed agreed protective order.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

Dated: September 9, 2008

By: s / Peter Ahmadian
PETER AHMADIAN
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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on September 9, 2008, he caused to be served, by Northern District of Illinois Electronic Case Filing, true and correct copies of **Agreed Motion For Entry of a Protective Order and Notice of Agreed Motion** on plaintiff's counsel of record as identified below. The undersigned further certifies that he caused to be served on the same counsel the Proposed Protective Order via electronic mail.

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s / Peter Ahmadian
PETER AHMADIAN
Assistant Corporation Counsel